

EXHIBIT C – DECLARATION OF DEBRA GRAHAM

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

MICHAEL AMOS, PITRELL BRISTER,
ANTONIO DAVIS, WILLIE FRIEND,
CHARLES GAYLES, DANIEL GUTHRIE,
JONATHAN J. HAM, DESMOND HARDY,
BILLY JAMES, JR., JUSTIN JAMES,
QUENTEN JOHNSON, CHALLIS LEWIS,
DEAUNTE LEWIS, LARRY MAXWELL,
TERRANCE MCKINNEY, DERRICK PAN,
BRANDON ROBERTSON, KURIAKI
RILEY, DERRICK ROGERS, TYREE
ROSS, H.D. ALEXANDER SCOTT,
DEANGELO TAYLOR, LEMARTINE
TAYLOR, CONTI TILLIS, DEMARCUS
TIMMONS, CARLOS VARNADO,
PHILLIP DECARLOS WEBSTER, ADRIAN
WILLARD, and CURTIS WILSON,

Plaintiffs,

v.

PELICIA E. HALL, in her official capacity
as the Commissioner of the Mississippi
Department of Corrections, and MARSHAL
TURNER, in his official capacity as the
Superintendent of the Mississippi State
Penitentiary,

Defendants.

No. 4:20-cv-00007-DMB-JMV

DECLARATION OF DEBRA GRAHAM

On this 24th day of January, 2020, I hereby declare:

1. My name is Debra Graham. I reside at 1370 Tullahoma Drive, Prattville, Alabama 36066.
2. I am a Registered Environmental Health Specialist/Registered Sanitarian credentialed through the National Environmental Health Association.
3. I have over thirty years of local government and correctional management experience, including auditing correctional and detention environments in an institutional setting for adherence to established health and safety standards, and conditions of confinement related to environmental regulations.
4. I have previously served as the Chief Compliance Officer directing and coordinating compliance with established standards and provisions of a Consent and Settlement Agreement between a large jail jurisdiction and the United States Department of Justice, including compliance coordination with health care services (medical and mental health), custody and security provisions, and environmental health and safety.
5. I am familiar with the 2018 Standards for Health Services in Prisons published by the National Commission on Correctional Health Care.
6. I am familiar with the above captioned matter including but not limited to reviewing the complaint, motion for emergency relief, accompanying affidavits, photos, videos, and other evidence of the prison conditions
7. The sewage that has risen from the plumbing system into the living and eating quarters of the inmates poses a severe irreparable and immediate threat to the inmates safety, health, and life.

8. Risk of sewage of this type and degree has the following serious and even lethal health risks:

- a. Campylobacteriosis is the most common diarrheal illness in the United States.

The infection is caused by the bacterium *Campylobacter*. While some people exhibit no symptoms, clinical manifestations include bloody diarrhea, cramping, abdominal pain, nausea, vomiting and fever within 2 to 5 days after exposure to the organism. In the immunocompromised, *Campylobacter* occasionally spreads to the bloodstream and causes a life-threatening infection.

- b. Also known as “diarrheogenic *E. coli*,” a disease caused by *Escherichia coli* bacteria of many different serotypes, including *E. coli* O157:H7. *Escherichia coli* can be transmitted by contaminated water or by person-to-person via the fecal-oral route. While some people exhibit no symptoms, most experience watery or bloody diarrhea, abdominal cramps, nausea, vomiting, and fever. In 2-7% of those who acquire *E. coli* O157:H7 infection, hemolytic uremic syndrome may develop, causing kidney failure and sometimes death. This syndrome occurs particularly in the elderly, and those with weakened immune systems. Some *E. coli* serotypes are thought to cause chronic diarrhea in HIV-infected patients.

- c. Viral gastroenteritis, also known as “stomach flu,” is an infection caused by any of a number of viruses including rotaviruses, adenoviruses, caliciviruses, astroviruses, Norwalk virus, and a group of Norwalk-like viruses. Symptoms include watery diarrhea, vomiting, headache, fever, and abdominal cramps. Generally, symptoms begin 1 to 2 days after infection, and may last for 1 to 10 days, depending on the virus involved. The illness can be severe for those who are disabled, elderly, or immunocompromised, if they cannot drink enough fluids to replace what they lose through vomiting or diarrhea.
- d. A liver disease caused by the virus Hepatitis A. Symptoms include jaundice, fatigue, abdominal pain, loss of appetite, nausea, diarrhea, and fever. Adults will exhibit symptoms of Hepatitis A more often than children. About 15% of those infected will have prolonged or relapsing symptoms over a 6-9 month period. One-third of Americans are immune to Hepatitis A because of past infection.
- e. A disease caused by bacteria of the genus *Leptospira*. Clinical manifestations include high fever, severe headache, chills, muscle aches, vomiting, jaundice, red eyes, abdominal pain, diarrhea, or a rash. Left untreated, Leptospirosis will cause kidney damage, meningitis, liver failure, respiratory distress, and in rare cases, death.

- f. A disease caused by the Poliomyelitis virus. While most exposed people exhibit no symptoms, some experience sore throat, fever, nausea, vomiting, abdominal pain, constipation, and occasionally diarrhea. However, less than 1% of those infected suffer paralysis. Most recover completely, and muscle function returns to some degree. However, any weakness or paralysis that remains 12 months after infection is usually permanent.
- g. A disease caused by a group of bacteria called *Salmonella*, the most common of which are *Salmonella typhimurium* and *Salmonella enteritidis*. Symptoms include diarrhea, fever, and abdominal cramps 12 to 72 hours after infection. The illness usually lasts 4 to 7 days, and most people recover without treatment. However, the disease can be severe for infants, young children, and those who are disabled, elderly, or immunocompromised, if they cannot drink enough fluids to replace what they lose through vomiting or diarrhea. Left untreated, *Salmonella* can spread from the intestines to the blood stream, to other sites, and can cause death.
- h. Shigellosis (also known as "Bacillary Dysentery") is caused by a group of bacteria called *Shigella*. *Shigella sonnei* and *Shigella flexneri* account for most of the Shigellosis in the United States. While some people experience no symptoms, most develop bloody diarrhea, fever, and stomach cramps starting a day or two after exposure. Shigellosis usually resolves in 5 to 7 days, but it can be severe for those who are disabled, elderly, or immunocompromised, if they cannot drink enough fluids to replace what they lose through diarrhea.
- i. A disease caused by a group of bacteria called *Salmonella paratyphi*. Symptoms are similar to that of Typhoid Fever, but are milder, yet can still result in death.

- j. A disease caused by the bacteria *Salmonella typhi*, which lives only in the bloodstream and intestinal tract of humans. Symptoms include a sustained fever as high as 104°F, weakness, cough, stomach pains, headache, and loss of appetite. Some patients have a rash of flat, rose-colored spots. Persons given antibiotics usually begin to feel better within 2 to 3 days, and death rarely occurs. Fever can continue for weeks and months in those who do not receive antibiotics. Of those not treated 20% will die from complications related to the infection. A small number of people, known as carriers, recover from Typhoid Fever but continue to carry the bacteria. Both ill persons and carriers shed *Salmonella typhi* in their stools. Even after symptoms recede, a person can still carry *Salmonella typhi*, in which case the illness could return or be passed on to others.
9. I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 24, 2020.


Debra Graham